William D. Brandt, OSB #720366 William D. Brandt, P.C. 880 Liberty Street NE, Suite 500 Salem, OR 97301

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Attorney for Defendants

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

LARRY DEAN CROW,

Plaintiff,

Case No. 3:13-cv-00757-ST

vs.

DEFENDANTS' MOTION TO CONTINUE TRIAL DATE

BROOKS MOTOR COMPANY, INC. an Oregon Corporation, and GARY BROOKS, individually,

Defendants.

## MOTION TO CONTINUE TRIAL DATE

COMES NOW defendants, by and through their attorney, William D. Brandt, and respectfully move this court for an order continuing the trial date of February 9, 2016 until a date after June 1, 2016. In support of this motion, defendants rely upon the records and files herein and upon the Declaration of William D. Brandt filed herewith.

## CERTIFICATE OF COMPLIANCE WITH L.R. 7.1

I certify I have complied with L.R. 7.1 prior to filing this motion. Opposing counsel indicates that plaintiff has no objection to a continuance of the trial to a date, although plaintiff requests that

the trial be reset "as soon as possible after April 1, 2016."

DATED this 10<sup>th</sup> day of December, 2015.

/s/ William D. Brandt
William D. Brandt, OSB #720366
Attorney for Defendants

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document on:

D. Michael Dale Attorney at Law PO Box 1032 Cornelius, OR 97113 Fax: 503-357-8290

Email: michaeldale@dmichaeldale.net

Banafsheh Violet Nazari Attorney at Law 1526 NE Alberta Street, Suite 310 Portland, OR 97211

Email: violet@nazarilaw.com

Attorney for Plaintiff

Attorney for Plaintiff

by	the	fol	lowing	indicated	method	or	method	ds:
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by mailing a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorney(s) and/or parties as shown above, the last-known office address of the attorney, and deposited with the United States Postal Service at Salem, Oregon, on the date set forth below.
by e-mailing a full, true, and correct copy thereof to the attorney(s) and/or parties as shown above, at the last known e-mail address of the person.

- by faxing a full, true, and correct copy thereof to the attorney(s) and/or parties as shown above, at the fax number(s) shown above, which is the last known fax number for the attorneys' office, on the date set forth below. The receiving fax machine was operating at the time of service and the transmission was properly completed. The confirmation report is available for inspection upon request.
- X by serving by electronic means through the court's CM/EFC system.

DATED this 10<sup>th</sup> of December, 2015.

/s/ William D. Brandt
William D. Brandt, OSB #720366
Attorney for Defendants